

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

UNITED STATES OF AMERICA

v.

WILLIAM J. HUBBARD
a/k/a Bill Hubbard

* CRIMINAL DOCKET NO. 09-264

* SECTION: "A"

* VIOLATION: 18 U.S.C. § 371
18 U.S.C. § 666

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FACTUAL BASIS

If this matter were to proceed to trial, the Government would have introduced the following through competent evidence and testimony beyond a reasonable doubt:

The Government would introduce competent testimony and documentary evidence that the defendant, **WILLIAM J. HUBBARD**, a/k/a Bill Hubbard (**HUBBARD**) was a public official, namely the elected President of St. John the Baptist Parish (St. John Parish), State of Louisiana. As such, **WILLIAM J. HUBBARD** was authorized, with approval from the St. John Parish Council, to enter into contracts for professional services on behalf of St. John Parish.

The Government would introduce competent testimony and documentary evidence to show that **WILLIAM J. HUBBARD**, used money from vendors who had and were seeking contracts with St. John Parish to purchase a vehicle (a Toyota Camry) for his 31 year old female friend with whom

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HUBBARD had ~~an ongoing~~ sexual relationship. **HUBBARD's** personal benefit was derived from the fact that he was obtaining money from these vendors to purchase an automobile for his female friend so that **HUBBARD** could conceal his relationship with her.

The government would establish that on or about May 5, 2009, **WILLIAM J. HUBBARD** sought a \$5,000 check from Vendor A. On or about May 5, 2009, Vendor A gave **HUBBARD** a \$5,000 check payable to a local automobile dealership. Approximately seven days later, on or about May 12, 2009, the St. John Parish Council passed a \$29.5 million dollar bond issue which resulted in Vendor A receiving a professional service contract worth approximately \$1 million dollars. On or about May 27, 2009, **HUBBARD**, in his capacity as the Parish President of St. John Parish, signed off on the bond issue and contract awarded to Vendor A. The Government would further show that Vendor A knew of **HUBBARD's** relationship with his female friend and assisted **HUBBARD** in concealing this relationship by helping **HUBBARD** purchase an automobile for her.

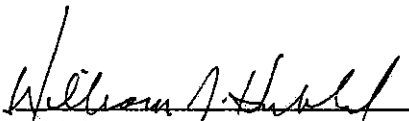
Further, the government would establish that on or about May 5, 2009, **WILLIAM J. HUBBARD** sought a \$5,000.00 check from Vendor B. On or about May 5, 2009, Vendor B gave **HUBBARD** a \$5,000.00 check payable to a local automobile dealership. Vendor B is engaged in business dealings with St. John Parish.

Further, the government would establish that on or about May 26, 2009, **WILLIAM J. HUBBARD** sought a \$10,000.00 check from Vendor C. On or about May 26, 2009, Vendor C gave **HUBBARD** a \$10,000.00 check payable to a local automobile dealership. Vendor C is engaged in business dealings with St. John Parish.

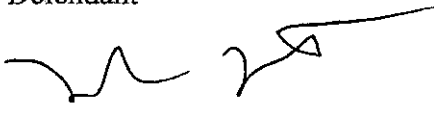
The government would present evidence to establish that on or about May 5, 2009, and on or about May 26, 2009, **WILLIAM J. HUBBARD** used the three checks he obtained from Vendors

A, B and C, totaling \$20,000.00, as a down payment on a new car. The government would present evidence that **WILLIAM J. HUBBARD** used the \$20,000.00 for his own benefit by assisting his female friend with whom he ^{Mr R had} ~~was having~~ a sexual relationship in purchasing a Toyota Camry.


The government would present evidence that St. John Parish receives in excess of \$10,000.00 from various federal programs and grants within a one year period – including the period of time the defendant, **WILLIAM J. HUBBARD** was the President of St. John Parish.


WILLIAM J. HUBBARD
Defendant

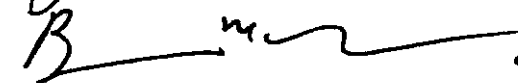
9/25/09
(Date)


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